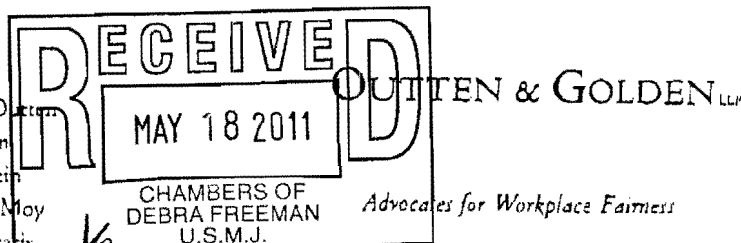


Wayne N. O'Brien
 Anne Golden
 Adam T. Klein
 Laurence S. Moy
 Kathleen Perakis
 Justin M. Swartz
 Jack A. Rnisher
 Wendi S. Lazar
 Carmelyn P. Malalis
 Tammy Marzigliano
 René S. Roupinian

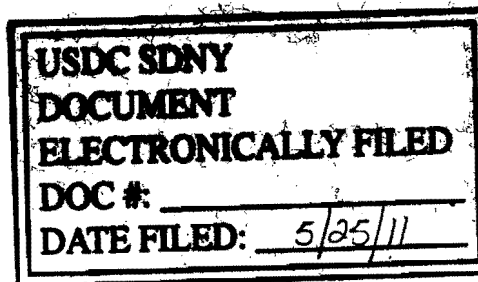
By Facsimile

Hon. Debra Freeman
 United States Magistrate Judge
 Southern District of New York
 500 Pearl Street, Suite 660
 New York, NY 10007
 Facsimile: (212) 805-6382

Re: Silverstein v. AllianceBernstein L.P.,
 No. 09-CIV-5904 (VM)



May 17, 2011



Allegra L. Fishel
 Lewis M. Steel
 Nanriya Ruan
 Samuel R. Miller
 Paul W. Mollica
 Delyanne D. Barros
 Rachel M. Bien
 Katherine Blostein
 Molly Brooks
 Cara E. Greene
 Mariko Hirose
 Sonia R. Lin
 Jennifer Liu
 Seth M. Marnin
 Ossai Miazad
 Melissa Pierre-Louis
 Sandra Pullman
 Lauren Schwartzreich
 Michael Scimone
 Dana Sussman
 Lynn Turner

MEMO ENDORSED

Dear Judge Freeman:

This firm represents Plaintiffs in the above-referenced action. We write to request a brief extension of the discovery period so that the parties can complete several previously noticed depositions. The first is that of Susanna Leniart, Plaintiff Silverstein's direct supervisor. This deposition was originally noticed on February 18, 2011 for a date in mid-March. Before Defendant provided dates on which Ms. Leniart would be available, she gave notice and left Defendant's employ. Plaintiffs have since served Ms. Leniart with a subpoena, but Defendant has indicated that the proposed date is not convenient and has yet to provide an alternative date.

Additionally, on May 11, 2011, Plaintiffs served Defendant with a Rule 30(b)(6) notice of deposition relating to a number of documents produced by Defendant on May 3, 2011. Defendant has yet to provide dates on which its designated witness can appear to testify and today indicated that it objects to the noticed deposition. Plaintiffs are hopeful that the parties can resolve this dispute and complete the deposition.

Finally, Defendant has noticed the deposition of opt-in Plaintiff Vincent Carey, but Mr. Carey is unable to appear for deposition prior to the scheduled close of discovery.

The parties therefore request a 30-day extension of the discovery period in order to complete the outstanding depositions. Discovery is presently scheduled to conclude on May 19, 2011. The parties have requested two previous adjournments to the discovery period. The only scheduled date affected by this request is a status conference presently scheduled before Judge Marrero on May 27, 2011. Defendant consents to this request as it relates to Ms. Leniart and Mr. Carey but, as previously noted, objects to the noticed Rule 30(b)(6) deposition.

SO ORDERED: DATE: 5/25/11

3 Park Avenue, 29th Floor New York, NY 10016 Tel 212-245-1000 Fax 212-277-4005

191 Post Road West, Westport, CT 06880 Tel 203-363-7888 Fax 203-363-7888

og@outtengolden.com www.outtengolden.com

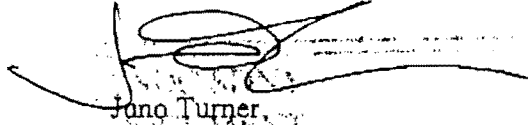
DEBRA FREEMAN

UNITED STATES MAGISTRATE JUDGE

Hon. Debra Freeman
May 17, 2011
Page 2 of 2

We thank the Court for its attention.

Respectfully submitted,



Jono Turner

cc: Lorie E. Almon, Esq. (via email)
Robert S. Whitman, Esq. (via email)
Mary Ahrens, Esq. (via email)
Gregory R. Fidlton, Esq. (via email)
Adam T. Klein, Esq. (via email)
Lewis M. Steel, Esq. (via email)
Molly Brooks, Esq. (via email)